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From: Croker@DC.NCGA.com
Sent: Tuesday, October 05, 2004 2:24 PM
To: FarmBillRules
Subject: Conservation Security Program
Attachments: ATTACHMENT.TXT

A hard copy will follow by mail.

October 5, 2004

Mr. Craig Derickson
Conservation Security Program Manager
Financial Assistance Programs Division
Natural Resources Conservation Service
P.O. Box 2890
Washington, D.C. 20013-2890

Re: Comments on the Interim Final Rule for the Conservation Security Program

Dear Mr. Derickson:

On behalf of the National Corn Growers Association (NCGA), I would like to thank you for the opportunity to comment on the Interim Final Rule for the Conservation Security Program (CSP). NCGA appreciated the extension of the comment period on the interim rule to October 5, 2004.

In previous comments, NCGA expressed disappointment with the rule primarily because it did not meet corn grower expectations. Corn growers also were disappointed because they anticipated the proposal would create unnecessary difficulties for those attempting to participate in the program.

Two NCGA grower-leaders participated in this summer's sign-up process. Both were accepted into the program; one at

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Tier I and the other at Tier II. NCGA's comments on the interim rule are based on the experience of these two growers. ^{N457}

NCGA continues to differ from other farm and environmental organizations in that it supports the watershed approach for the early years of the program. NCGA's primary concern is that the program get off to a meaningful start. Corn growers believe it is in the best interest of farmers and the agency to get it right from the beginning.

Fundamentally, NCGA believes that in order for the program to be successful it must work for farmers. This does not mean that we believe no effort on the part of the producer should be required. On the contrary, the program should require a demonstrated commitment to conservation.

However, the corollary is that NRCS staff must be available to help farmers understand the program and navigate the application process. In some watersheds, NRCS employees should be commended for their efforts to disseminate information on the program and work with farmers who wanted to apply.

Generally, NCGA is pleased with the sign-up process. However, in some watersheds, NCGA has learned NRCS staff may have not exercised the oversight necessary to ensure only qualified candidates were enrolled. We urge the agency to correct this situation.

While NCGA appreciated the clarification of eligibility requirements in the interim final rule, corn growers continue to be concerned about this issue. NCGA does not believe NRCS recognizes the trend toward renting. Today, very few farmers have control of all the land they farm for the five to ten years envisioned by CSP.

With the experience provided by one sign-up, it is clear that these provisions will keep large amounts of land out of the program. Our growers found that they had to enroll smaller acreages in order to meet the program requirements, even if they farmed rented land that met the requirements. NCGA recognizes the challenges in addressing this issue. Corn growers encourage the agency to continue to work to resolve them.

Corn growers report that the benchmark inventory was a useful tool, and that it did not hinder participation in the program. It did not take a long time for most to complete.

Many news articles reported on the expected paperwork burden of completing the benchmark inventory and the application process. These concerns turned out not to be true. While a farmer must have taken the time and made the effort to apply, it was generally not a burdensome process. NRCS should continue to focus on the benefits of the program and not the potential work involved in applying and complying with the program.

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NCGA strongly encourages NRCS to ensure only eligible acreages are enrolled in CSP. NCGA supports the motto of Reward the Best; Motivate the Rest. If some farmers have attempted to use CSP for other reasons, they will only hurt the program, the agency and other farmers. Corn growers ask NRCS to conduct the appropriate and necessary oversight to preserve the integrity of the program.

Thank you again for the opportunity to comment.

Sincerely,

Leon Corzine

President

Betsy Croker

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